



U.S. Department of Justice

United States Attorney Southern District of New York

1 St. Andrew's Plaza New York, New York 10007

June 7, 2021

Honorable Paul A. Engelmayer United States District Judge Southern District of New York 40 Foley Square New York, New York 10007

Re: United States v. Justin Rivera, 19 Cr. 131 (PAE)

Dear Judge Engelmayer:

The Government writes regarding the defendant's motion to strike a portion of Professor Raghavan's testimony. During cross examination, Professor Raghavan was asked the following question and gave the following answer:

Q. Pimps are often adept at spotting these vulnerabilities, correct?

A. Not really. There is lots of pimps who are terrible at it and get arrested very quickly or do too much too soon or some are better than others. But there is lots who actually attempt and fail. Those are the ones that don't come to trial. We see them in research, but they don't come to trial because they are so bad at it that they do something else.

Tr. 782:21-783:3. The Government proposes that only the last two sentences of Professor Raghavan's response be stricken. The rest of the response does not refer to when pimps do or do not go to trial.

Respectfully submitted,

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